

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

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ALTERRA AMERICA INSURANCE CO.,

Plaintiff,

v.

NATIONAL FOOTBALL LEAGUE, et al.,

Defendants.

Index No. 652813/2012 E

Hon. Andrea Masley

**STIPULATION**

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DISCOVER PROPERTY & CASUALTY  
COMPANY, et al.,

Plaintiffs,

v.

Index No. 652933/2012 E

Hon. Andrea Masley

NATIONAL FOOTBALL LEAGUE, et al.,

Defendants.

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IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned  
counsel as follows:

WHEREAS, the Court issued an initial Case Management Order on November  
14, 2016;

WHEREAS, by Stipulation dated May 25, 2017, the parties agreed to an  
extension of certain disclosure deadlines, which was so ordered by the Court on August  
8, 2017;

WHEREAS, by Stipulation dated April 6, 2018, the parties agreed to a further extension of certain disclosure deadlines, which was so ordered by the Court on May 1, 2018;

WHEREAS, the parties have undertaken a significant amount of written and document disclosure and have engaged in extensive “meet and confer” efforts on their various discovery disputes;

WHEREAS, on February 28, 2019, the parties received an order from Special Referee Dolinger on five disclosure-related motions and are currently in the process of briefing objections to certain of Special Referee Dolinger’s rulings;

WHEREAS, notwithstanding the progress that they have made to date, the parties recognize that there exist several pending (and potentially future) disputes that need to be resolved before the remainder of discovery can be completed;

WHEREAS, the parties have conferred and agree that the current case management deadlines should be extended;

WHEREAS, the Case Management Order provides that the disclosure deadlines set forth therein may be adjourned via stipulation amongst the parties;

WHEREAS, the parties have advised Special Referee Dolinger of their agreement that the current case management deadlines should be extended and shared with Special Referee Dolinger a draft of this Stipulation;

WHEREFORE, it is hereby stipulated and agreed by and among the undersigned counsel that:

1. The March 29, 2019 deadline for the completion of depositions of fact witnesses is extended to and including March 27, 2020;

2. The parties shall complete all fact discovery by April 30, 2020;
3. The April 30, 2019 deadline for the service of any expert reports is extended to and including May 29, 2020;
4. The June 28, 2019 deadline for the service of any rebuttal expert reports is extended to and including July 31, 2020;
5. The August 30, 2019 deadline for the completion of depositions of any experts is extended to and including September 30, 2020.

This stipulation may be executed in counterparts, each of which shall be deemed an original but all of which constitute one and the same agreement. Facsimile signatures, and those executed with the permission of counsel, shall have the same force and effect as originals.

Counsel for Defendants TIG Insurance Company, United States Fire Insurance Company, and The North River Insurance Company signs below on behalf of itself and states that counsel for all other insurer parties join in this stipulation.

Dated: March 19, 2019

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